

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND DIVISION

IN RE:	§	Case No. 17-70126-TMD
WEST TEXAS BULLDOG OILFIELD	§	
SERVICES, INC.	§	
Debtor	§	Chapter 7

**MOTION TO SELL PROPERTY BY AUCTION**

Ronald Ingalls, Trustee, files this Motion to Sell Property by Auction pursuant to 11 USC § 363(b), and would show the Court as follows:

1. The movant is Ronald Ingalls, Chapter 7 Trustee, in this case which was filed on July 17, 2017, and converted to Chapter 7 on November 16, 2017.
2. The estate owns several titled vehicles— trucks and trailers, which are or may be unencumbered. The debt on some of these vehicles may have been paid but the lender has not executed a release of lien. The issues are being worked on. The vehicles are shown on Exhibit A to the Auction Commission Agreement attached as an exhibit to this Motion.
3. The Trustee is filing an Application to Employ Auctioneer to employ PPL Group. PPL Group has an auction scheduled in the Odessa area on January 25, 2018. This auction will include the vehicles and equipment of WT Bulldog that are collateral for Big Shoulders Capital (current holder of debt and liens formerly held by Security Bank).
4. The Trustee requests authority to sell all these items at the January 25 auction. The auctioneers will be a paid a five percent commission on the sales. The auctioneer will also collect and retain a buyers premium. The auctioneer will also collect \$750 for reimbursement of all expenses of moving and storage, and advertising and conducting the sale.
5. The Trustee does not intend to sell the collateral of any secured creditor.

Wherefore, premises considered, Ronald Ingalls, Trustee, prays that the Court approve the

sale of the Property by auction, and pay the auctioneers commission, and for other just relief.

Respectfully submitted,

/s/ Ronald Ingalls

Ronald Ingalls, Trustee

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Chapter 7 Trustee

#### CERTIFICATE OF SERVICE

The signature above certifies that this Motion was served by first class mail on the attached matrix by The Noticing Center with service ordered on January 10, 2018.